UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
OREGON OPERATIONS OFFICE
805 SW Broadway, Suite 500
Portland, Oregon 97205

June 23, 2009

Mr. Robert Wyatt
Northwest Natural & Chairman, Lower Willamette Group
220 Northwest Second Avenue
Portland, Oregon 97209

Re: Portland Harbor Superfund Site; Administrative Order on Consent for Remedial Investigation and Feasibility Study; Docket No. CERCLA-10-2001-0240 – Areas of Potential Concern

Dear Mr. Wyatt:

On May 27 and 28, EPA and the Lower Willamette Group (LWG) engaged in a joint discussion of the Areas of Potential Concern (AOPCs) for the Portland Harbor Site. During the meeting, EPA and the LWG reached agreement on the mapping process for the identification of the AOPCs. The attached figure depicting AOPCs for the Portland Harbor site represents the culmination of that effort.

As stated in your email dated June 5, 2009, the mapping process considered the following lines of evidence as agreed upon at the May 27th and May 28th meeting:

1. Map Small Mouth Bass Total PCB PRG (Preliminary Remediation Goal) at a 10-4 cancer risk level using the by-river mile hill topping approach. The PRG equates to 29.54 ug/kg dry weight total PCBs achieved on a SWAC (Surface-weighted Average Concentration) basis by river mile. Use a replacement value equal to the PRG in the hill topping routine.
2. Map a site-wide hilltop that provides a site-wide target SWAC of 17 ug/kg Total PCBs, which represents one estimate of background. Use 17 ug/kg as the replacement value in the hill topping routine.
3. Map the tribal fisher direct contact PRG for 10-6 cancer risk; hill topping by direct contact sub areas. This PRG equates to a benzo(a)pyrene concentration of 423.25 ug/kg dry weight.
4. Add the "common" Probable Benthic Risk Areas, which are the areas that both EPA and LWG currently agree have benthic risks.

Although the AOPCs were identified based on total PCBs, benzo(a)pyrene and benthic risk, there are other chemicals that pose risk as the Portland Harbor site such as organochlorine pesticides and chlorinated dibenzo dioxins and furans. However, because other chemicals posing risk to human health or the environment are generally collocated with total PCBs, benzo(a)pyrene and probable benthic risk areas, they were not used in the AOPC identification

process but will still need to be considered in the Portland Harbor FS. In addition, it should be noted that areas outside of the individual AOPCs also pose an unacceptable, although generally lower level, risk throughout the current study area. These areas will be evaluated as part of a site-wide AOPC. Finally, the AOPCs were identified prior to completion of the baseline human health and ecological risk assessments; the results of these risk assessments will also need to be considered in the development of final AOPCs for Portland Harbor site.

The combined EPA and LWG AOPCs depicted in the attached figure demonstrate a strong degree of agreement. The primary difference between the two sets of AOPCs is that EPA grouped the areas that were mapped according to the four lines of evidence described above to minimize fragmentation of the site. As a result, the EPA AOPCs identified in the attached figure should be used as the starting point for the Portland Harbor FS. EPA expects these AOPCs to expand or contract as they evolve into Sediment Management Areas (SMAs) through the consideration of a range of physical, chemical, biological, land and water use and source considerations. In addition, these AOPCs were identified primarily based on surface sediment chemistry; subsurface sediment chemistry and erosion potential will need to be considered in the evolution of AOPCs in to SMAs. These same factors will be considered as SMAs are screened against a range of remedial action alternatives developed for the Portland Harbor site. EPA expects to reach agreement with the LWG on the screening or remedial action alternatives in the fall of 2009 prior to initiation of the detailed and comparative analysis of remedial action alternatives in the FS.

If you have any questions, please contact Chip Humphrey at (503) 326-2678 or Eric Blischke (503) 326-4006. All legal inquiries should be directed to Lori Cora at (206) 553-1115.

Sincerely,

Chip Humphrey
Eric Blischke
Remedial Project Managers

cc: Greg Ulirsch, ATSDR
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Ted Buerger, US Fish and Wildlife Service
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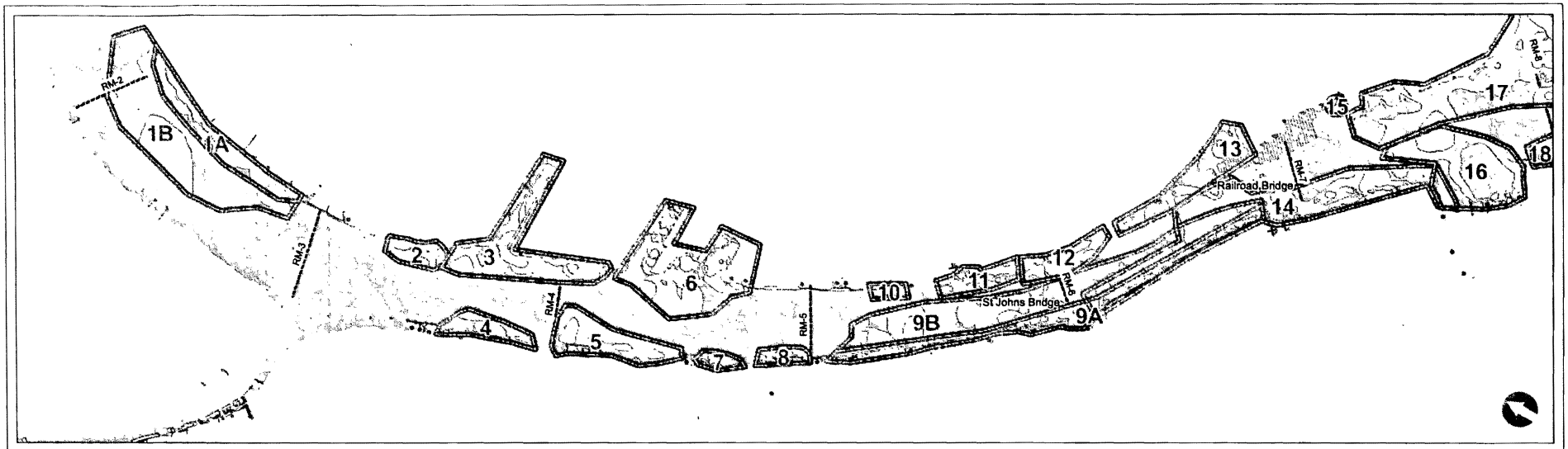
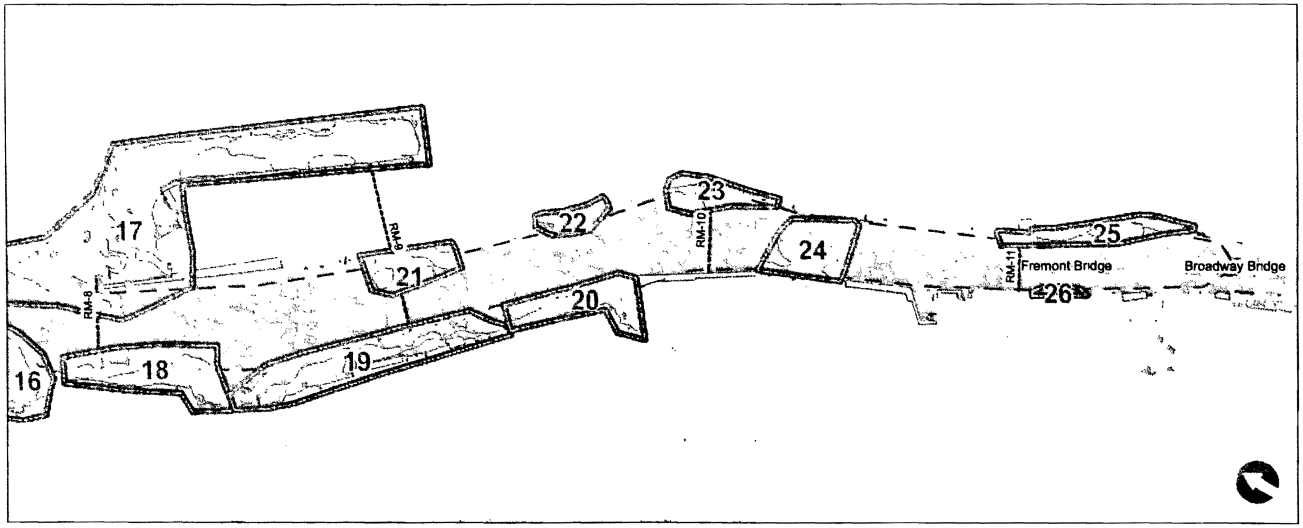
Michael Karnosh, Confederated Tribes of Grand Ronde
Tom Downey, Confederated Tribes of Siletz
Audie Huber, Confederated Tribes of Umatilla
Brian Cunninghame, Confederated Tribes of Warm Springs
Erin Madden, Nez Perce Tribe
Rose Longoria, Confederated Tribes of Yakama Nation





Draft AOPCs for Portland Harbor Site

June 2009

River Mile 1.9 to 11.8

LEGEND

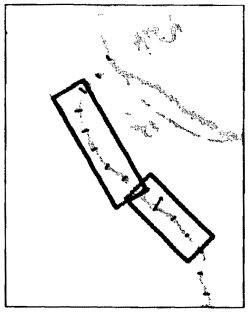
LWG AOPCs_revised 060509

EPA AOPCs 051409

Feet

0 1,000 2,000 3,000 4,000

DRAFT



AOPC DEVELOPMENT NOTES

AOPCs are based on the mapping of surface sediment chemistry against the following lines of evidence

1 Recreational small mouth bass fish consumption preliminary remediation goal (PRG) for total PCBs at a 10-4 cancer risk level using the by-river mile hill topping approach The PRG equates to 29.54 ug/kg dry weight total PCBs achieved on a Surface-weighted Average Concentration (SWAC) basis by river mile Use a replacement value equal to the PRG in the hill topping routine

2 Site-wide hilltopping approach that results in a site-wide target SWAC of 17 ug/kg total PCBs, which represents one estimate of background Use 17 ug/kg as the replacement value in the hill topping routine

3 Tribal fisher direct contact PRG for benzo(a)pyrene at a 10-6 cancer risk, hill topping by direct contact sub areas This PRG equates to a benzo(a)pyrene concentration of 423.25 ug/kg dry weight Use a replacement value equal to the PRG in the hill topping routine

4 "Common" Probable Benthic Risk Areas, which are the areas that both EPA and LWG currently agree have benthic risks

It should be noted that areas outside of the individual AOPCs identified on this figure also pose an unacceptable, although generally lower, risk to human health and the environment throughout the current study area These areas will be evaluated as part of a site-wide AOPC

AOPCs were identified prior to completion of the baseline human health and ecological risk assessments and represent a starting point for the Portland Harbor Feasibility Study (FS) AOPCs may expand or contract based on the consideration of additional site information and the results of the baseline human health and ecological risk assessments